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April 1, 2013

via hand delivery

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

FILED/ACCEPTED

APR - 1 2013

Federal Communications Commission
Office of the Secretary

Attn: CGB Room 3-B431

**Re: Opposition to Petitions for Exemption from the
Commission's Closed Captioning Rules
CG Docket No. 06-181**

CGB-CC-0005

Anglers for Christ Ministries
("Anglers") / *The Christian
Angler Outdoors Television Show*

CGB-CC-0046

Dilworth Church of
Christ ("Dilworth") /
Seeking the Lost

CGB-CC-0314

First Assembly of God
Jonesboro ("Jonesboro") /
The Gospel of Jesus Christ

CGB-CC-0413

Kellogg Street Productions
("Kellogg") / *Mohawk Valley
Living*

CGB-CC-0876

Opal Crews Word of
Life ("OCWL") / *Opal
Crews Word of Life*

Dear Ms. Dortch:

Pursuant to the Commission's Request for Comment and 47 C.F.R. § 79.1(f)(6), Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), the National Association of the Deaf (NAD), the Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), the Association of Late-Deafened Adults (ALDA), and the Cerebral Palsy and Deaf Organization (CPADO), collectively, "Consumer Groups," respectfully submit this opposition to the petitions of the above-referenced entities,

collectively, "Petitioners," to exempt their programming from the Commission's closed captioning rules.¹

The petitions each fail to sufficiently demonstrate that compliance with closed captioning rules would be economically burdensome. Several Petitioners also mistakenly request a determination that their programming qualifies for a self-executing categorical exemption or assert other unavailing arguments for exempting their programming. We hope that highlighting the shortcomings common to these petitions will aid the Commission in reaching determinations consistent with applicable statutory requirements and provide useful guidance to future petitioners seeking exemptions from the Commission's closed captioning rules.

Consumer Groups acknowledge Petitioners' efforts to engage with the public through the medium of video programming. Petitioners' requested exemptions, however, would deny access to their programming to community members who are deaf or hard of hearing. Maximizing accessibility through the comprehensive use of closed captions is a critical component of ensuring that all viewers can experience the important benefits of video programming on equal terms.

Because the stakes are so high for the millions of Americans who are deaf or hard of hearing, it is essential that the Commission grant petitions for exemptions from captioning rules only in the rare case that a petitioner conclusively demonstrates that captioning its programming would impose a truly untenable economic burden. To make such a demonstration, a petitioner must present detailed, verifiable, and specific documentation that it cannot afford to caption its programming, either with its own revenue or with alternative sources. In doing so, a petitioner must make clear that it has

¹ *Public Notice, Request for Comment: Request for Exemption from Commission's Closed Captioning Rules*, CG Docket No. 06-181 (Feb. 28, 2013), http://transition.fcc.gov/Daily_Releases/Daily_Business/2013/db0228/DA-13-312A1.pdf. Detailed information on the petitions is included in the attached Appendix.

engaged in a diligent, good faith effort to caption its programming and is turning to the exemption process only as a last resort.

I. Legal Standard

Under Section 713(d)(3) of the Communications Act of 1934 ("1934 Act"), as added by the Telecommunications Act of 1996 Act ("1996 Act") and amended by Section 202(c) of the 21st Century Communication and Video Accessibility Act of 2010 ("CVAA"), "a provider of video programming or program owner may petition the Commission for an exemption from the [closed captioning] requirements of [the 1934 Act], and the Commission may grant such petition upon a showing that the requirements . . . would be economically burdensome."² In its *Economically Burdensome Standard Order*, the Commission interpreted the term "economically burdensome" as being synonymous with the term "undue burden" as defined in Section 713(e) of the 1934 Act, and ordered the Consumer and Governmental Affairs Bureau to continue to evaluate all exemption petitions using the "undue burden" standard pursuant to Rule 79.1(f)(2)-(3).³

In some early adjudications, the Commission specifically analyzed exemption petitions under the four-factor rubric in Section 713(e), analyzing whether each of the four factors weighed for or against granting a particular petition.⁴ Over the past decade,

² 47 U.S.C. § 613(d)(3); Pub. L. 111-260, 124 Stat. 2751 § 202(c); Pub. L. 104-104, 110 Stat. 56 § 305.

³ *Report and Order, Interpretation of Economically Burdensome Standard; Amendment of Section 79.1(f) of the Commission's Rules; Video Programming Accessibility*, CG Docket No. 11-175, 27 FCC Rcd. 8831, 8834-35, ¶ 8 (2012) ("*Economically Burdensome Standard Order*"). The *Economically Burdensome Standard Order* formally adopted the analysis and interim standard proposed in a multi-part 2011 decision, *Anglers for Christ Ministries, Inc., New Beginning Ministries, Petitioners Identified in Appendix A, Interpretation of Economically Burdensome Standard; Amendment of Section 79.1(f) of the Commission's Rules; Video Programming Accessibility*, Memorandum Opinion and Order, Order, and Notice of Proposed Rulemaking, CG Docket Nos. 06-181 and 11-175, 26 FCC. Rcd. 14941 (Oct. 20, 2011) ("*Anglers 2011*"). See generally *id.*

⁴ E.g., *Home Shopping Club L.P.*, Case No. CSR 5459, 15 FCC Rcd. 10,790, 10,792-94 ¶¶ 6-9 (CSB 2000).

however, this factor-based analysis has evolved into several specific evidentiary requirements that must be satisfied to support a conclusion that a petitioner has demonstrated an undue economic burden sufficient to satisfy the requirements of Section 713(e).⁵

Under Section 713(e), a petitioner must first demonstrate its inability to afford providing closed captions for its programming.⁶ If a petitioner sufficiently demonstrates an inability to afford captioning, it must also demonstrate that it has exhausted alternative avenues for obtaining assistance with captioning.⁷ Where a petition fails to make either of those showings, it fails to demonstrate that providing captions would be economically burdensome, and the Commission must dismiss the petition.⁸

II. Ability to Afford Captioning

To sufficiently demonstrate that a petitioner cannot afford to caption its programming, a petition must provide both verification that the petitioner has diligently sought out and received accurate, reasonable information regarding the costs of captioning its programming, such as competitive rate quotes from established providers, and detailed information regarding the petitioner's financial status.⁹ Both showings must demonstrate that the petitioner in fact cannot afford to caption its programming and eliminate the possibility that captioning would be possible if the petitioner reallocated its resources or obtained more reasonable price quotes for captioning its programming.

A. Cost of Captioning

To successfully demonstrate that captioning would be economically burdensome, a petitioner must demonstrate a concerted effort to determine "the most reasonable

⁵ See generally *Anglers 2011*, 26 FCC Rcd. at 14,955-56, ¶ 28.

⁶ See *id.*

⁷ See *id.*

⁸ See *id.*

⁹ See *id.*

price” for captioning its programming.¹⁰ To allow the Commission and the public to evaluate whether a petitioner’s cost estimates are reasonable, it is essential that a petition provide, at a bare minimum, detailed information about the basis and validity of its cost estimates for captioning, such as competitive hourly rate quotes and associated correspondence from several established captioning providers.¹¹

None of the petitions satisfy these requirements. More specifically:

- Anglers provides four estimates but offers no documentation of their basis.¹²
- Dilworth documents only a single individualized estimate.¹³
- Jonesboro apparently did not seek individualized estimates, and instead provides only general price sheets from three captioning providers.¹⁴
- Kellogg asserts it sought estimates from multiple providers, but provides no documentation and does not state the source of its most recent estimates.¹⁵
- OCWL documents only one individualized estimate.¹⁶ It also asserts that it sought additional quotes for captioning services, but provides no supporting documentation.¹⁷

Moreover, no petition appears to document any attempt to negotiate with captioning providers to seek a more affordable rate after receiving an estimate. For

¹⁰ See *The Wild Outdoors*, Case No. CSR 5444, 16 FCC Rcd. 13,611, 13,613-14 ¶ 7 (CSB 2001), cited with approval in *Anglers 2011*, 26 FCC Rcd. at 14,956, ¶ 28 n.101.

¹¹ Compare, e.g., *Outland Sports, Inc.*, Case No. CSR 5443, 16 FCC Rcd. 13,605, 13,607, ¶ 7 (CSB 2001) (approving of a petitioner’s inclusion of rate quotes and associated correspondence from at least three captioning providers in its petition) with *The Wild Outdoors*, 16 FCC Rcd. at 13,613-14, ¶ 7 (disapproving of a petitioner’s bald assertion of the cost to caption a program without supporting evidence).

¹² *Anglers Supplement I* at 5 (unsubstantiated estimates of \$200-\$450 per 30 min. program).

¹³ *Dilworth Supplement I* at 11.

¹⁴ *Jonesboro Supplement I* at 5-9.

¹⁵ *Kellogg Petition* at 1 (unsubstantiated estimate of \$300-\$400 for captioning services); *Kellogg Supplement* at 2 (unsubstantiated estimates of \$200-\$250 for captioning services).

¹⁶ *OCWL Supplement II* at 2.

¹⁷ *OCWL Supplement III* at 1, 8.

example, Dilworth does not assert or provide evidence that it followed up with additional correspondence with the captioning provider after receiving an initial estimate.¹⁸

It is critical that petitioners seek out and document several personalized, negotiated estimates to establish what it would actually cost to caption their programming. Just as with any other service, no sensible business owner would simply engage the first captioning provider he or she was able to locate regardless of cost. A prudent owner would diligently seek out the most affordable and highest quality provider to suit his or her specific needs. Without documentation that a petitioner has undertaken such a search, it is simply impossible to conclude that the petitioner has established the most reasonable price for captioning its programming and turned to the exemption process only as a last resort because it cannot afford that price. Because Petitioners have each failed to satisfy this threshold, the Commission should deny their petitions.

B. Financial Status

Even where a petition successfully establishes the most reasonable price for captioning the petitioner's programming, it must also include detailed information regarding the petitioner's finances and assets, revenues, expenses, and other documentation "from which its financial condition can be assessed" that demonstrates that captioning would impose an undue economic burden.¹⁹

Anglers and Jonesboro note that they are non-profit entities.²⁰ But as the Commission has plainly stated, "grant[ing] Anglers [and other petitioners] favorable exemption treatment because of their non-profit status [is] inconsistent with . . .

¹⁸ See *Dilworth Supplement I* at 11.

¹⁹ See, e.g., *Survivors of Assault Recovery*, Case No. CSR 6358, 20 FCC Rcd. 10,031, 10,032, ¶ 3 (MB 2005), cited with approval in *Anglers 2011*, 26 FCC Rcd. at 14,956, ¶ 28 n.100.

²⁰ *Anglers Supplement I* at 1; *Jonesboro Supplement I* at 2.

Commission precedent.”²¹ In fact, the Commission has “specifically rejected requests by commenters to adopt a categorical exemption for all non-profit entities based solely on their non-profit status” and has “chose[n] instead to adopt revenue-based exemption standards that . . . focus on the economic strength of each [petitioner].”²² A petitioner’s non-profit status does not suggest, much less preclude, the possibility that it cannot afford to caption its programming.

Next, several petitioners, including Dilworth and Jonesboro, evaluate their ability to afford captioning in comparison to the budget allocated for or expenses incurred by the specific programming at issue or argue that the failure of their program to generate revenue in and of itself suggests an economic burden.²³ The specific budget for or revenue generated by a particular program, however, is irrelevant to the Commission’s determination. When evaluating the financial status of a petitioner, the Commission “take[s] into account the overall financial resources of the provider or program owner,” not “only the resources available for a specific program.”²⁴

While the failure of Petitioners to sufficiently document the most reasonable cost of captioning their programming obviates the need for the Commission to conduct a full-fledged analysis of their financial information, we note that most of the petitions appear to lack sufficient information to conclude that captioning would impose an undue financial burden.

Kellogg does not appear to provide detailed statements of its financial information, such as annual revenues and expenses and available assets in the form of bank statements.²⁵ Anglers and Jonesboro indicate that their programs operate at a loss, but do not appear to offer a tenable explanation of how they are able to shoulder the

²¹ *Anglers* 2011, 26 FCC Rcd. at 14,951, ¶ 18.

²² *Id.* at 14,950-51, ¶ 18 (citations omitted).

²³ See *Dilworth Supplement I* at 1; *Anglers Supplement I* at 1; *Jonesboro Supplement I* at 1.

²⁴ *Anglers* 2011, 26 FCC Rcd. at 14,950, ¶ 17.

²⁵ See *Kellogg Supplement I* at 2 (stating profits and losses for only three months).

ongoing costs of creating and distributing their programming but not the cost of closed captions.²⁶

Finally we note that at least two of the Petitioners, Dilworth and OCWL, fail to provide relevant financial information for one or more affiliated entities that appear to be directly involved in the financial support and/or production of the relevant programming. More specifically, Dilworth's petition states that its program *Seeking the Lost* is supported by nine individual congregations, including those of eight other churches.²⁷ While Dilworth provides the bank statements of its own congregation, it does not appear to provide any financial information for the eight other congregations that support its television program.²⁸ Documentation of the other congregations' finances is necessary to determine whether captioning *Seeking the Lost* would in fact impose an undue economic burden.

Likewise, OCWL's *Word of Life* program appears to be under the control of or strongly affiliated with the Cornerstone Word of Life Church ("Cornerstone"). Episodes of *Word of Life* are available on Cornerstone's web page.²⁹ *Word of Life*'s host Opal Crews is also a teacher at the church's Bible Institute, and is paid a salary by Cornerstone.³⁰ But the petition does not contain any information regarding the church's finances or the extent to which *Word of Life* is funded and/or controlled by Cornerstone. The Commission cannot reasonably conclude that an entity effectively operating a wholly

²⁶ See *Anglers Supplement I* at 3 (indicating that the TV ministry operated at a loss of \$8,195.80 in 2011); *Jonesboro Supplement I* at 1; *Jonesboro Supplement II* at 1 (indicating that the church operated at a loss of \$46,315.67 in 2011).

²⁷ See *Dilworth Supplement I* at 1.

²⁸ See *Dilworth Supplement II* at 21-57.

²⁹ See *Words of Live with Rev. Opal Crews*, Cornerstone Word of Life Church, <http://cwol.org/media/words-of-life/> (last visited Apr. 1, 2013).

³⁰ See *The Teachers*, Cornerstone Word of Life Church, <http://cwol.org/ministries/bible-institute/teachers/> (last visited Apr. 1, 2013); *OCWL Supplement III* at 6.

controlled video programming operation can qualify for an economic burden exemption based on the finances of an individual involved with the programming.

The 1996 Act and the CVAA do not permit the Commission to grant exemptions on the basis of undue economic burden to petitioners who cannot concisely establish why captioning would impose an undue economic burden. Therefore, the Commission should deny the petitions.

III. Alternative Avenues for Captioning Assistance

Even where a petition succeeds at demonstrating that a petitioner cannot afford to caption its programming, the petitioner must also demonstrate that it has exhausted all alternative avenues for attaining assistance with captioning its programming.³¹ A petitioner must provide documentation showing that it has sought assistance from other parties involved with the creation and distribution of its programming,³² sought sponsorships or other sources of revenue to cover captions, and is unable to obtain alternative means of funding captions.³³

Jonesboro apparently has not sought out sponsors specifically for closed captioning either because it is unwilling to accept commercial sponsorship or does not believe that it will be able to succeed in recruiting sponsors.³⁴ Petitioners cannot decline to seek sponsors for the cost of captioning and simultaneously establish that providing captioning would impose an undue economic burden, and a preference not to engage sponsors cannot relieve a petitioner of its obligation to comply with the Commission's closed captioning rules.

³¹ *Anglers 2011*, 26 FCC Rcd. at 14,955-56, ¶ 28 (internal citations omitted).

³² See, e.g., *Engel's Outdoor Experience*, Case No. CSR 5882, 19 FCC Rcd. 6867, 6868, ¶ 3 (MB 2004), cited with approval in *Anglers 2011*, 26 FCC Rcd. at 14,956, ¶ 28 n.102.

³³ See *Outland Sports*, 16 FCC Rcd. at 13607-08, ¶ 7, cited with approval in *Anglers 2011*, 26 FCC Rcd. at 14,956, ¶ 28 n.103.

³⁴ See *Jonesboro Supplement I* at 1-2 (stating that there is no advertising associated with Jonesboro's program).

Anglers, Kellogg, and OCWL indicate that they have sought sponsorships, but provide limited or no documentation of these efforts.³⁵ Petitioners must describe and document their attempts to seek out sponsorships, as it is impossible for the Commission and the public to conclude that all alternative avenues have been exhausted without detailed information regarding a petitioner's efforts to do so.

IV. Requests for Categorical Exemptions

In addition to asserting that captioning would constitute an undue economic burden, OCWL argues that it also qualifies for one of the categorical exemptions under Rule 79.1(d)(1).³⁶ As a general matter, the Consumer and Governmental Affairs Bureau has repeatedly noted that these exemptions are self-implementing.³⁷ As such, they are not properly the subject of, and cannot be considered under, an economic burden petition filed pursuant to Rule 79.1(f).³⁸

OCWL apparently believes that its programming qualifies for the locally produced and distributed, non-news, non-repeating exemption to the closed captioning rules for video programming distributors.³⁹ But as the Consumer and Governmental Affairs Bureau has repeatedly recognized, the narrow exemption in Rule 79.1(d)(8) applies only to "[p]rogramming that is locally produced by [a] video programming distributor, has no repeat value, is of local public interest, is not news programming, and for which the "electronic news room" technique of captioning is unavailable."⁴⁰

³⁵ See *Anglers Supplement I* at 1; *Kellogg Supplement* at 3; *OCWL Supplement III* at 2.

³⁶ 47 C.F.R. 79.1(d).

³⁷ E.g., *Letter from the Consumer and Governmental Affairs Bureau to The Justice Foundation* at 1, <http://apps.fcc.gov/ecfs/document/view?id=7022032173> (Sept. 26, 2012).

³⁸ 47 C.F.R. § 79.1(f).

³⁹ See *OCWL Supplement II* at 1.

⁴⁰ 47 C.F.R. § 79.1(d)(8) (emphasis added); e.g., *Letter from the Consumer and Governmental Affairs Bureau to Red Bradley*, CGB-CC-1239 (June 20, 2012), <http://apps.fcc.gov/ecfs/document/view?id=7021977573>.

Entities like OCWL and Cornerstone are plainly not video programming distributors under the meaning of the Commission's rules and cannot qualify for this exemption.⁴¹

V. Other Factors

Dilworth and Kellogg propose alternatives to captioning their programming. Dilworth suggests that its program has "an alternative to closed captioning because of the great amount of text displayed in each scene," while Kellogg suggests providing each episode's transcript on its website.⁴² Closed captions are essential because they allow deaf and hard of hearing viewers to have equal access to television programming, which cannot be achieved with graphics or transcripts. While Consumer Groups acknowledge Kellogg's and Dilworth's efforts to make their programming accessible, providing graphical or textual supplements is not an adequate substitute for closed captioning.

Finally, we note that Anglers requested a two-year exemption from the closed captioning requirements.⁴³ As described above, Anglers has not sufficiently demonstrated that captioning *The Christian Angler Outdoors Show* would create an undue economic burden. Moreover, Anglers' programming has been exempt from the Commission's rules for the more than seven-and-a-half years since Anglers filed its original petition, during which Anglers has apparently made no measurable progress toward captioning its programming. If the Commission nonetheless determines that Anglers or any other petitioner should be granted an exemption, Consumer Groups respectfully request that the exemption be limited to no more than one year.

VI. Conclusion

Petitioners have not sufficiently demonstrated that captioning their programming would impose an undue economic burden. Accordingly, we respectfully urge the

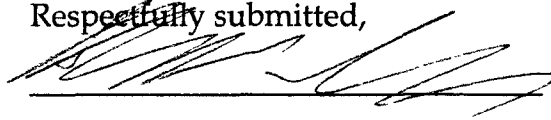
⁴¹ See 47 C.F.R. § 79.1(a)(2) (defining "video programming distributor").

⁴² *Dilworth Supplement I* at 1, 6; *Kellogg Supplement* at 3.

⁴³ See *Anglers Supplement I* at 1.

Commission to dismiss the petitions and require the Petitioners to bring their programming into compliance with the closed captioning rules.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Blake E. Reid', is written over a horizontal line.

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April 1, 2013

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CC:

Roger Holberg, Consumer and Governmental Affairs Bureau

Traci Randolph, Consumer and Governmental Affairs Bureau

Karen Peltz Strauss, Consumer and Governmental Affairs Bureau

CERTIFICATION

Pursuant to 47 C.F.R. §§ 1.16 and 79.1(f)(9), I, Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), hereby certify under penalty of perjury that to the extent there are any facts or considerations not already in the public domain which have been relied on in the foregoing document, these facts and considerations are true and correct to the best of my knowledge.

A handwritten signature in black ink that reads "Claude L. Stout". The signature is written in a cursive style with a large, looped "C" and a distinct "L".

Claude Stout
April 1, 2013

CERTIFICATE OF SERVICE

I, Niko Perazich, Office Manager, Institute for Public Representation, do hereby certify that, on April 1, 2013, pursuant to the Commission's aforementioned Request for Comment, a copy of the foregoing document was served by first class U.S. mail, postage prepaid, upon the petitioners at the addresses listed in the attached Appendix.

A handwritten signature in black ink, appearing to read 'Niko Perazich', written over a horizontal line.

Niko Perazich

April 1, 2013

Appendix

| Case No. | Petitioner | Short Name | Program Name | Mailing Address | Case Documents |
|-------------|---------------------------------|------------|---|--|--|
| CGB-CC-0005 | Anglers for Christ Ministries | Anglers | <i>The Christian Angler Outdoors Show</i> | 2224 Fish Hatchery Rd. Morristown, TN 37813 | <i>Anglers Petition</i> (October 12, 2005) <i>Anglers 2006 Order</i> (September 12, 2006) <i>Anglers 2011 Order</i> (Oct. 20, 2011) <i>Letter from the Consumer and Governmental Affairs Bureau I</i> (October 25, 2011) <i>Anglers Supplement I</i> (January 20, 2012) <i>Letter from the Consumer and Governmental Affairs Bureau II</i> (April 18, 2012) <i>Anglers Supplement II</i> (May 18, 2012) <i>Anglers Supplement III</i> (December 12, 2012) |
| CGB-CC-0046 | Dilworth Church of Christ | Dilworth | <i>Seeking the Lost</i> | 1404 Drummond Cemetery Rd. Jasper, AL 35504 | <i>Dilworth Petition</i> (December 19, 2005) <i>Letter from the Consumer and Governmental Affairs Bureau I</i> (September 11, 2006) <i>Letter from the Consumer and Governmental Affairs Bureau II</i> (October 25, 2011) <i>Dilworth Supplement I</i> (January 17, 2012) <i>Letter from the Consumer and Governmental Affairs Bureau III</i> (April 11, 2012) <i>Dilworth Supplement II</i> (June 12, 2012) |
| CGB-CC-0314 | First Assembly of God Jonesboro | Jonesboro | <i>The Gospel of Jesus Christ</i> | 1404 Stone St. Jonesboro, AR 72401 | <i>Jonesboro Petition</i> (January 11, 2006) <i>Letter from the Consumer and Governmental Affairs Bureau I</i> (September 11, 2006) <i>Letter from the Consumer and Governmental Affairs Bureau II</i> (October 25, 2011) <i>Jonesboro Supplement I</i> (January 19, 2012) <i>Letter from the Consumer and Governmental Affairs Bureau III</i> (April 18, 2012) <i>Jonesboro Supplement II</i> (May 21, 2012) |
| CGB-CC-0413 | Kellogg Street Productions | Kellogg | <i>Mohawk Valley Living</i> | 30 Kellogg St. Clinton, NY 13323 | <i>Kellogg Petition</i> (February 6, 2006) <i>Letter from the Consumer and Governmental Affairs Bureau</i> (April 5, 2012) <i>Kellogg Supplement</i> (July 2, 2012) |
| CGB-CC-0876 | Opal Crews Word of Life | OCWL | <i>Opal Crews Word of Life</i> | 308 Dublin Circle Madison, AL 35758 | <i>OCWL Petition</i> (March 13, 2009) <i>Letter from the Consumer and Governmental Affairs Bureau I</i> (April 5, 2012) <i>OCWL Supplement I</i> (June 11, 2012) <i>Letter from the Consumer and Governmental Affairs Bureau II</i> (July 18, 2012) <i>OCWL Supplement II</i> (October 16, 2012) <i>Letter from the Consumer and Governmental Affairs Bureau III</i> (October 31, 2012) <i>OCWL Supplement III</i> (November 27, 2012) |